

Mr. Kim Dirks
IBP, Inc.
800 Stevens Port Drive, Suite 710
Dakota Dunes, SD 57049-8710

Dear Mr. Dirks:

Re: Exempt Construction and Operation Status,
017-12944-00034

The application from IBP, Inc., received on November 8, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following equipment to be located at Highway 35 & 25 Bypass, Logansport, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) proposed Aerosolve® aerosol can puncturing system with a maximum capacity of 4,000 spent aerosol cans per hour. The system includes a 55 gallon drum that collects the aerosol can product residual liquid that contains volatile organic compounds (VOC) and hazardous air pollutants. The system is equipped with carbon filter.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This existing source has submitted their Part 70 application (T 017-7369-00034) on December 5, 1996, which is pending for issuance. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

APD

cc: File - Cass County
Cass County Health Department
Air Compliance -Ryan Hillman
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak
Part 70 application file (T 017-7369-00034)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: IBP, Inc.
Source Location: Highway 35 & 25 Bypass, Logansport, Indiana 46947
County: Cass
SIC Code: 2011
Operation Permit No.: 017-12944-00034
Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed an application from IBP, Inc. relating to the construction and operation of the following equipment:

- (a) One (1) proposed Aerosolve® aerosol can puncturing system with a maximum capacity of 4,000 spent aerosol cans per hour. The system includes a 55 gallon drum that collects the aerosol can product residual liquid that contains volatile organic compounds (VOC) and hazardous air pollutants. The system is equipped with carbon filter.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on November 8, 2000.

Emission Calculations

- (a) **Aerosolve® Aerosol Can Puncturing System Emissions:**
The source's process operation does not involve aerosol can filling. The source buys the aerosol can products mostly used for maintenance purposes. The proposed Aerosolve® Aerosol Can Puncturing System will be used for treatment of waste aerosol cans, as an alternative to the previous practice of hazardous waste disposal of cans bulked in drums as solid waste. Empty cans resulting from the process are recycled as scrap metal.

There are no emission factors in the AP-42, nor in the Factors Information Retrieval (FIRE) available. Since there are no emission factor available, the emissions will be determined based on California EPA standard, that is, all the VOC and HAP usages that are in the aerosol cans will all be emitted.

IBP's Total Usage:

Total VOC Used in Products	-	3208.2 pounds/year
	-	8.8 pound/day
Total VOC Used in Products which are HAPs	-	1452 pounds/year
	-	4.0 pound/day
VOC Emissions	=	3208.2 pounds/year * 100% flash off * ton/2000 lb
	=	1.6 tons/year
HAPs Emissions	=	1452 pounds/year * 100% flash off * ton/2000 lb
	=	0.73 ton/year

Potential To Emit of Revision Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	1.6
CO	0.0
NO _x	0.0
Combined HAPs	0.73

Note: The source's Part 70 permit TV017-7369-00034 is still pending for issuance.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds or HAPs are exempted from the registration and permitting requirements, pursuant to 326 IAC 2-1.1-3

County Attainment Status

The source is located in Cass County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD),

326 IAC 2-2 and 40 CFR 52.21.

- (b) Cass County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Proposed Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Aerosol can puncturing	0.0	0.0	0.0	1.6	00.0	0.0	0.73
Total Emissions	0.0	0.0	0.0	1.6	00.0	0.0	0.73

Actual Emissions

The following table shows the actual emissions, reflected in the OAQ emission data):

Pollutant	Emissions (ton/yr)
PM	30
PM10	30
SO ₂	0.0
VOC	8
CO	23
NO _x	27
HAPs	0.0

Potential To Emit

This table reflects the PTE before controls from the **existing source**.

Pollutant	Potential To Emit (tons/year)
PM	< 100
PM-10	< 100
SO ₂	< 100
VOC	> 100
CO	< 100
NO _x	> 100
Single HAP	< 10
Combined HAPs	< 25

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and NO_x are each equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The source's Part 70 permit TV017-7369-00034 is still pending for issuance.

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS):
There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

- (a) 326 IAC 2-6 (Emission Reporting)
This source modification is not by itself subject to 326 IAC 2-6 (Emission Reporting). However, since the source is a Part 70 source, it is subject to 326 IAC 2-6.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 8 (Volatile organic Sources):
There are no rules in article 326 IAC 8 that would apply to the aerosol can puncturing process, because it is not one of the sources listed in the rules.
- (b) 326 IAC 8-1-6 (General Reduction Requirements)
New facilities as of January 1, 1980 which have potential VOC emissions of 25 tons per year or more, located anywhere in the states which are not otherwise regulated by other provisions of this article 326 IAC 8, shall reduce VOC emissions using best available control technology.
- The proposed Aerosolve® Aerosol Can Puncturing System is not subject to this rule, because it does not have the potential VOC emissions of 25 tons per year.
- (c) 326 IAC 2-4.1 (New Toxics Control)
The proposed aerosol can puncturing operation is not subject to 326 IAC 2-4.1 (New Toxics Control) because it is not emitting single HAP nor HAPs at major levels.

Conclusion

The construction and operation of this aerosol can puncturing system shall be subject to the conditions of the attached **Exemption 017-12944-00034**.